



May 16, 2025

U.S. Department of Commerce  
1401 Constitution Ave NW  
Washington, DC 20230  
Submitted via [www.regulations.gov](http://www.regulations.gov).

Re: Notice of Request for Public Comments on Section 232 National Security Investigation of Imports of Trucks

Docket No. 250422-0071

Dear Docket Clerk,

Pursuant to the Bureau of Industry and Security, Office of Strategic Industries and Economic Security and U.S Department of Commerce's NPRM regarding *Section 232 National Security Investigation of Imports of Trucks* published on April 25, 2025, the Truckload Carriers Association (TCA) hereby submits these comments.

TCA, with offices at 555 E Braddock Road, Alexandria, VA, is the only national trade association whose collective sole focus is the truckload segment of the trucking industry. The association represents dry van, refrigerated, flatbed, and rail intermodal carriers operating in 48 contiguous U.S. states, Alaska, Mexico, and Canada. As a significant part of an industry with over half a million companies operating millions of power units within the United States, TCA and its trucking company members regularly comment on matters affecting the national transportation industry's common interests and potential impacts.

Since the start of conversations around the United States imposing tariffs on countries nationwide, specifically on Mexico and Canada, our members have voiced their concerns about the supply chain disruption.

Some of our members are beginning to see early signs of recovery in their operations. However, any disruption to the supply chain, especially those that increase operational costs, threatens to undermine that progress entirely. Carriers are already facing dramatic increases in key cost areas, most notably insurance premiums, which some have reported surges of 20-30%. If tariffs are imposed on truck parts or other essential components, the added financial burden will further diminish profitability, and the costs could be passed on to American consumers in the form of higher prices at the grocery store and beyond.

Even though tariffs on truck parts are not yet in effect, carriers are already feeling the financial strain. Many have reported that their suppliers are adding surcharges to equipment purchases in anticipation of potential tariff increases. This preemptive price

padding clearly indicates the financial pressure carriers may face when higher-cost components enter the supply chain.

Additionally, carriers are already limited to purchasing equipment from just four major manufacturers, and in some cases, only one serves as the sole provider of specific parts. This lack of supplier diversity leaves carriers with little flexibility to shop around or negotiate for lower prices, making it increasingly difficult to manage costs effectively.

As trucks and equipment prices rise and options narrow, many TCA members have reported that they plan on holding off on purchasing new trucks. Instead, they are extending the life of their existing fleets in hopes that equipment prices will eventually stabilize. However, prolonging the use of older trucks, whose average lifespan is between 450,000 and 550,000 miles, can increase maintenance costs and ultimately drive up the cost per mile, emptying the pockets of the motor carrier.

Lastly, the uncertainty surrounding tariffs only compounds structural challenges in the trucking industry. In particular, the nationwide truck parking crisis and aging infrastructure are not just daily obstacles for carriers and drivers, but significant threats to operational efficiency and safety. Congested roadways and the persistent lack of safe, designated truck parking have increased incidents involving trucks being struck while parked on entrance and exit ramps of rest areas. Alarming, several of our members have reported more insurance claims related to vehicle damage than injury claims, highlighting the operational and financial strain created by limited access to safe parking and the resulting demand for vehicle repairs and replacement parts. Should tariffs drive up the cost of truck parts, and with insurance claims already rising due to these infrastructure-related issues, carriers will face mounting operational costs from all fronts.

TCA appreciates the opportunity to comment on the 232 investigation and is more than happy to be a resource if further questions arise.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Ward". The signature is fluid and cursive, with a large initial "J" and "W".

Jim Ward  
TCA President